

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  CarePoint Health Systems Inc. d/b/a Just Health Foundation, et al., <sup>1</sup>  <div style="text-align: center; padding-top: 20px;">Debtors.</div>	x : : : : : : : v	Chapter 11 Case No. 24-12534 (JKS)  (Jointly Administered)
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**NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR HEARING ON  
FEBRUARY 12, 2025 AT 10:00 A.M. (ET)<sup>2</sup>**

This proceeding will be conducted **in-person**.

All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.  
Please refer to Judge Stickles' Chambers Procedures  
(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website  
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate  
remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of  
remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the  
hearing unless otherwise noticed using the [eCourtAppearances](http://www.deb.uscourts.gov/ecourt-appearances) tool available on the Court's  
website.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

<sup>2</sup> All motions and other pleadings referenced herein are available online at the following web address:  
<https://dm.epiq11.com/CarePoint>

## **I. MATTERS GOING FORWARD**

- 1.** Motion of CarePoint Health Systems, Inc. for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (V) Authorizing Debtors to Use Cash Collateral [Filed 11/03/2024; D.I. [10](#)].

### Related Documents:

- A. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024; D.I. [87](#)].
- B. Interim Order (I) Authorizing Certain Debtors to Obtain Postpetition Financing from Bayonne Medical Center Opco, LLC and Granting Senior Security Interests and Superpriority Administrative Expense Status to the Lender; (II) Authorizing the Debtors' Use of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filed: 11/08/2024; D.I. [119](#)].
- C. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].
- D. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)].
- E. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/10/2024; D.I. [275](#)].
- F. Order Approving Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [367](#)].
- G. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 01/08/2025; D.I. [416](#)].

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

### Responses:

- H. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024; D.I. [71](#)].

- I. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- J. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)].
- K. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)].
- L. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)].

Status: This matter is going forward for the limited purpose of entry of an interim order authorizing further interim financing through March 17, 2025

- 2. Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed 11/03/2024, D.I. [11](#)].

Related Documents:

- A. Amendment to Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 11/06/2024, D.I. [68](#)].
- B. Interim Order Authorizing Debtors to Postpetition Financing [Filed: 11/07/2024, D.I. [87](#)]. (See 1A)

- C. Interim Order (A) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Postpetition Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Modifying the Automatic Stay, (E) Authorizing Debtors to Enter Into Agreements with Bayonne Medical Center Opco, LLC, (F) Granting Adequate Protection, (G) Scheduling a Final Hearing and (H) Granting Related Relief [Filed: 11/08/2024; D.I. [128](#)].
- D. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)]. (See [1C](#))
- E. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/09/2024; D.I. [265](#)]. (See [1D](#))
- F. Order Approving Further Debtor-In-Possession Financing on an Interim Basis [Filed: 12/26/2024; D.I. [367](#)]. (See [1F](#))
- G. Order Authorizing Further Debtor-In-Possession Financing on an Interim Basis [Filed: 01/08/2025; D.I. [416](#)]. (See [1G](#))

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- H. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)]. (See [1H](#))
- I. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- J. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)]. (See [1I](#))
- K. Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral [Filed: 11/13/2024; D.I. [133](#)]. (See [1J](#))
- L. The County of Hudson's Limited Objection to Debtors' Motions for Interim and Final Orders to Obtain Post-Petition Financing [Filed: 12/09/2024; D.I. [261](#)]. (See [1K](#))
- M. Limited Objection of Med One Capital Funding LLC and Mazuma Capital Corp to Debtors' Motions for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority

Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed: 12/09/2024; D.I. [262](#)]. (See 1L)

Status: This matter is going forward for the limited purpose of entry of an interim order authorizing further interim financing through the hearing on March 17, 2025.

- 3.** Motion of Access Information Management Corporation (I) to Compel (A) Debtors' Assumption of Executory Contracts, or Alternatively, (B) Debtors to Provide Direction as Required by the Contracts and Applicable Law with Respect to the Continued Storage, Transfer, Destruction or Other Disposition of the Health Care Related Documents and Information Subject to the contracts, (II) For Relief from the Automatic Stay, and (III) for Such Other Relief as is Necessary Under the Circumstances [Filed: 12/17/2024; D.I. [320](#)].

Related Documents:

- A. Access Information Management Corporation's Reply in Response to Debtors' Objection to and In Further Support of Its Motion to Compel and for Related Relief [Filed: 02/07/2025; D.I. [660](#)].

Objection Deadline: December 31, 2024 at 4:00 p.m. (ET)

Objections Received:

- B. Debtors' Objection To Access Management Information Management Corporation's Motion (I) to Compel (a) Debtors' Assumption of Executory Contracts, or Alternatively, (b) Debtors to Provide Direction as Required by the Contracts and Applicable Law With Respect to the Continued Storage, Transfer, Destruction or Other Disposition of the Health Care Related Documents and Information Subject to the Contracts, (II) For Relief From the Automatic Stay, and (III) for Such Other Relief as is Necessary Under the Circumstances [Filed: 12/31/2024; D.I. [381](#)].

Status: This matter is going forward.

- 4.** Debtors' First Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 12/27/2024; D.I. [374](#)].

Related Documents: None.

Objection Deadline: January 10, 2025 at 4:00 p.m. (ET). The objection deadline was extended to January 31, 2025 at 4:00 p.m. (ET) for Mazuma Capital Corp.

Responses:

- A. Mazuma Capital Corp's Limited Objection to Debtors' First Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases and Reservation of Rights [Filed: 01/31/2025; D.I. [612](#)].

Status: This matter is going forward

- 5.** Motion of the Official Committee of Unsecured Creditors for Entry of an Order Regarding the Challenge Deadline [ Filed: 01/14/2025; D.I. [434](#)].

Related Documents:

- A. Official Committee of Unsecured Creditors' Motion to Shorten Notice of Motion Regarding the Challenge Deadline [Filed: 01/14/2025; D.I. [435](#)].

Objection Deadline: Undetermined.

Responses:

- B. Objection of Senior Secured Agents to Motion of the Official Committee of Unsecured Creditors for Entry of an Order Regarding the Challenge Deadline [Filed: 02/04/2025; D.I. [647](#)].

Status: This matter is going forward.

- 6.** Application of David N. Crapo, Patient Care Ombudsman, for Entry of an Order Authorizing the Retention and Employment of Gibbons, P.C. as Counsel, Nunc Pro Tunc as of December 2, 2024 [Filed: 01/14/2025; D.I. [442](#)].

Related Documents: None.

Objection Deadline: January 29, 2025 at 4:00 p.m.

Responses Received:

- A. Objection and Reservation of Rights of the Debtors Regarding the Patient Care Ombudsman's Retention of Gibbons, P.C. as Counsel [Filed: 01/29/2025; D.I. [595](#)].

Status: The Debtors voluntarily extended the reply deadline to February 10, 2025 at 11:00 a.m. This matter will go forward.

7. Motion of Camille Swain, D.O., for: (I) Limited Relief from the Automatic Stay to (A) Continue the Prosecution of her Complaint for Wrongful Termination, and (B) Recover from the Proceeds of the Debtors' Applicable Insurance Policies that are Not Property of the Estate; and (II) Waive the 14-day Automatic Stay under Bankruptcy Rule 4001 [Filed: 01/17/2025; D.I. [511](#)].

Related Documents: None.

Objection Deadline: February 5, 2025 at 4:00 p.m. (ET). The objection deadline for the Debtors has been extended at the Debtors' request.

Responses: None.

Status: The parties are currently in negotiations to resolve the issue. This matter is going forward.

8. Motion of the Debtors for Entry of an Order (I) Establishing Deadlines for the Filing of Proofs of Claim; (II) Approving the Form and Manner of Notice Thereof; and (III) Granting Related Relief [Filed: 01/31/2025; D.I. [613](#)].

Related Documents:

- A. Motion of the Debtors to Shorten Notice and Schedule Expedited Hearing with Respect to Motion of the Debtors Seeking Entry of an Order Establishing a Bar Date [Filed: 01/31/2025; D.I. [614](#)].
- B. Order Granting Motion to Shorten Notice and Schedule Expedited Hearing with Respect to Motion of the Debtors Seeking Entry of an Order Establishing a Bar Date [Filed: 02/04/2025; D.I. [620](#)].

Objection Deadline: Objections may be made at the Hearing.

Responses: None.

Status: The Debtors will submit a revised form of Order. This matter is going forward.

## II. MATTERS NOT GOING FORWARD

9. Motion of Saint Peter's University Hospital for an Order (A) Granting Request for Allowance and Payment of Administrative Expense Claim and (B) Fixing Deadline for the Debtors to Assume or Reject Exclusive Services Agreement or, in the Alternative, Granting Relief from the Automatic Stay [Filed: 12/13/2024; D.I. [300](#)].

Related Documents: None.

Objection Deadline: December 27, 2024 at 4:00 p.m. (ET)

Objections Received:

- A. Debtors' Limited Objection to Saint Peter's University Hospital's Motion for Entry of an Order (A) Granting Request for Allowance and Payment of Administrative Expense Claim and (B) Fixing Deadline for the Debtors to Assume or Reject Exclusive Services Agreement or, in the Alternative, Granting Relief from the Automatic Stay [Filed: 12/27/2024; D.I. [372](#)].

Status: This matter has been continued to March 12, 2025 at 10:00 a.m.

10. Motion of the Debtors for Order Pursuant to Sections 105(a), 363, and 364 of the Bankruptcy Code for Authority to Enter Into an Insurance Premium Finance Agreement With AFCO in the Ordinary Course of Business [Filed: 12/27/2024; D.I. [373](#)].

Related Documents:

- A. Certificate of No Objection Regarding Motion of the Debtors for Entry Pursuant to Sections 105(a), 363, and 364 of the Bankruptcy Code for Authority to Enter Into an Insurance Premium Finance Agreement With AFCO in the Ordinary Course of Business [Filed 01/14/2025; D.I. [441](#)].
- B. Order Authorizing Debtors to Enter Into Insurance Premium Finance Agreement with AFCO in the Ordinary Course of Business [Filed: 01/17/2025; D.I. [514](#)].

Objection Deadline: January 10, 2025 at 4:00 p.m. (ET).

Objections Received: None.

Status: An Order has been entered. This matter will not go forward.

**11.** Motion of Cremilde Goncalves for Entry of an Order Granting Relief from Automatic Stay [Filed: 01/03/2025; D.I. [396](#)].

Related Documents:

- A. Certification of Counsel Regarding Stipulation By and Between The Debtors and Cremilde Goncalves Resolving Motion for Relief from the Automatic Stay to Continue Pending Litigation [Filed: 01/30/2025; D.I. [599](#)].
- B. Order Approving Stipulation By and Between the Debtors and Cremilde Goncalves Resolving Motion for Relief from the Automatic Stay to Continue Pending Litigation [Filed: 01/31/2025; D.I. [611](#)].

Objection Deadline: January 17, 2025 at 4:00 p.m.

Responses Received:

- C. Debtors Objection to Motion of Cremilde Goncalves for Relief from the Automatic Stay to Continue Pending Litigation [Filed: 01/17/2025; D.I. [508](#)].

Status: An Order has been entered. This matter will not go forward.

**12.** Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of November 22, 2024 [Filed: 01/09/2025; D.I. [423](#)].

Related Documents:

- A. Certification of No Objection Regarding Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of November 22, 2024 [Filed: 02/04/2025; D.I. [648](#)].
- B. Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of November 22, 2024 [Filed: 02/05/2025; D.I. [650](#)].

Objection Deadline: January 23, 2025 at 4:00 p.m. (ET)

Objections Received: None

Status: An Order has been entered. This matter will not go forward.

Dated: February 10, 2025

**DILWORTH PAXSON LLP**

/s/ Peter C. Hughes

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Peter C. Hughes (DE 4180)  
800 N. King Street, Suite 202  
Wilmington, DE 19801  
Telephone: 302-571-9800  
Facsimile: 302-571-8875  
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)  
Peter C. Hughes (DE 4180)  
Anne M. Aaronson (admitted *pro hac vice*)  
Jack Small (admitted *pro hac vice*)  
1650 Market St., Suite 1200  
Philadelphia, PA 19103  
Telephone: (215) 575-7000  
Facsimile: (215) 754-4603  
Email: lmcmichael@dilworthlaw.com  
Email: phughes@dilworthlaw.com  
Email: aaaronson@dilworthlaw.com  
Email: jsmall@dilworthlaw.com

*Counsel for the Debtors*